

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

HUMAN RIGHTS DEFENSE CENTER,

Plaintiff,

v.

SOUTHWEST VIRGINIA REGIONAL JAIL
AUTHORITY; STEPHEN CLEAR,
Superintendent, in his individual and official
capacities; and DOES 1-10, in their individual
and official capacities,

Defendants.

Civil Action No. 1:18-cv-00013-JPJ-PMS

**PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTIVE
RELIEF**

Pursuant to Federal Rule of Civil Procedure 65, and for the reasons set forth in the accompanying memorandum, Plaintiff Human Rights Defense Center ("Plaintiff"), by and through its attorneys, respectfully hereby moves this Court for a preliminary injunction enjoining Defendants—the Southwest Virginia Regional Jail Authority, Stephen Clear, and Does 1-10 (collectively "Defendants")—from violating Plaintiff's constitutional rights by improperly censoring publications and correspondence mailed by Plaintiff to persons incarcerated in the Southwest Virginia Regional Jail Authority's facilities, and by failing to provide Plaintiff with proper notice of such censorship. A proposed order is attached hereto as Exhibit 1.

DATED: March 29, 2018

Respectfully submitted,

s/ Sean M. Douglass

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**Pro hac vice applications to be filed.*

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of March 2018, I electronically filed the foregoing Motion, along with the Declaration of Paul Wright, and the Memorandum of Law in Support of Plaintiff's Motion for Preliminary Injunctive Relief, with the Clerk of Court using the CM/ECF system. I will cause all of the aforementioned documents to be served on Defendants—the Southwest Regional Jail Authority and Stephen Clear—along with the Complaint.

s/ Sean M. Douglass

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